

201-15607



"Hartwell, Gail"  
<ggarvin@dow.com>

09/24/2004 11:43 AM

To: 'chem.rtk@epa.gov'

cc: "Madsen, Steve (SS)" <ssmadsen@dow.com>, "Eisenbrandt, Dave" <dleisenbrandt@dow.com>, "Kranzfelder, James (JA)" <JKranzfelder@dow.com>, "Burgert, Linda (LC)" <lburgert@dow.com>, "Clark, Martin (JT)" <JTCLARK@dow.com>, "Berdasco, Nancy (NM)" <NMBerdasco@dow.com>, "Hartwell, Gail" <ggarvin@dow.com>

Subject: Updated HPV SUBMISSION for 2-chloro-5-trichloromethylpyridine (CA No. 69045-78-9)

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> Sir: Enclosed are the HPV documents for 3,4,5,6-tetrachloro-2-pyridine, which we wish to have posted on the EPA website for HPV chemicals. I have enclosed a cover letter, an updated robust summary for PCP as well as the robust summary for 3,4,5,6-tetrachloro-2-pyridine. Please do not hesitate to contact me if you have any questions or comments.

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> > <<Updated Beta-2-Tet cover letter.pdf>> > > <<IUCLID 2-Chloro-5-trichloromethylpyridine.pdf>> > > <<Updated IUCLID 2176-62-7.pdf>>

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>

>

> Thanks,  
> Gail Garvin  
> Environmental Health and Safety  
> EH&S Delivery Specialist  
> Dow AgroSciences LLC  
> 9330 Zionsville Rd.  
> Indianapolis, IN 46268  
> (317)337-3609  
> (317)337-3215 Fax  
> ggarvin@dow.com  
>

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Updated Beta-2-Tet cover letter.pdf IUCLID 2-Chloro-5-trichloromethylpyridine.pdf Updated IUCLID 2176-62-7.pdf

Dow AgroSciences LLC  
9330 Zionsville Road  
Indianapolis, IN 46268

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Ms. Marianne L. Horinko  
Administrator  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116

Dear Ms. Horinko:

**CHEMICAL RIGHT TO KNOW – HPV CHALLENGE PROGRAM**

On behalf of Dow AgroSciences LLC, I am pleased to notify you that a robust summary, in IUCLID format, for 2-chloro-5-trichloromethylpyridine (CAS No. 69045-78-9), as well as an updated robust summary for 2,3,4,5,6-pentachloropyridine (CAS No. 2176-62-7) have been posted onto the U.S. HPV Chemical Tracking System. All documents are in Adobe Acrobat (pdf) files.

Qualitative structure-activity relationship (QSAR) data comparing 2-chloro-5-trichloromethylpyridine (CAS No. 69045-78-9) and 2,3,4,5,6-pentachloropyridine, in conjunction with these robust summaries will satisfy the requirements of HPV.

We understand this information will be posted on the Internet for comments for a period of 120 days. Please forward comments to me at the following address:

Ms. Gail M. Garvin  
Dow AgroSciences LLC  
9330 Zionsville Road  
Indianapolis, IN 46268

Sincerely,

Gail M. Garvin  
Global Environmental, Health & Safety Specialist  
(317) 337-3609  
ggarvin@dow.com

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